

November 15, 1995

VIA FEDERAL EXPRESS

Mr. Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response division
U.S. Environmental Protection Agency, Region II.
2890 Woodbridge Avenue
Edison, NJ 08837

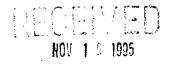
Re: Bayonne Barrel & Drum Superfund Site
Response to CERCLA 104(e) Information Request by The Solvents Recovery
Service of New Jersey, Inc.

Dear Mr. Cosentino:

The Solvents Recovery Service of New Jersey, Inc. ("SRSNJ") hereby submits its response to EPA's Request for Information pursuant to Section 104(e)(1) and (2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9601 et seq. SRSNJ submits this response pursuant to the aforementioned statute, but does not waive any rights or defenses that it may assert in the future should issues arise in connection with the Bayonne Barrel & Drum Site.

Please be advised that SRSNJ received an extension until November 15th, pursuant to a telephone conversation with Kathleen Callahan, Director, Emergency and Remedial Response Division, to submit this response.

The information submitted herewith is made to the best of SRSNJ's knowledge based on a diligent record search and interviews with former SRSNJ employees. SRSNJ reserves the right to supplement this response if additional information is discovered. SRSNJ also reserves the right to assert a confidentiality claim on any documents or materials that it may submit in the future.





Mr. Joseph Cosentino November 15, 1995 Page 2

The "Certification of Answers to Request for Information" is not attached hereto, but will be submitted within 5 working days of the date of this response. Because the individual qualified to sign the Certification could not be reached prior to submittal of this Response, SRSNJ will supplement this information as soon as possible. If you have any questions or problems regarding the delayed submittal of the Certification, please contact me immediately at (708) 468-2571.

Sincerely,

Laura A. Novak

Environmental Paralegal

cc: Marc Seidenberg, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

THE SOLVENTS RECOVERY SERVICE OF NEW JERSEY'S RESPONSES TO U.S. EPA'S 104(e) INFORMATION REQUEST **BAYONNE BARREL & DRUM SITE NEWARK.NJ**

General Information About the Company 1.

State the correct and legal name of the Company.

Respondent's legal name is The Solvents Recovery Service of New Jersey, Inc. ("SRSNJ").

Identify the legal status of the Company (corporation, partnership, sole b. proprietorship, specify if other) and the state in which the Company was organized.

SRSNJ is a corporation that was organized in the State of New Jersey on January 4, 1960.

State the names and addresses of the President and the Chairperson of the c. Board of the Company.

The President and Chairperson of the Board for SRSNJ are as follows:

President:

Mr. Robert W. Willmschen, Jr.

1000 North Randall Road

Elgin, IL 60123

Chairperson: Mr. Robert W. Willmschen, Jr.

1000 North Randall Road

Elgin, IL 60123

If the Company has subsidiaries or affiliates, or is a subsidiary of another d. organization, identify these related companies and state the names and addresses of the Presidents and the Chairpersons of the Board of those organizations. Provide such information for any further parent/subsidiary relationships.

On information and belief, SRSNJ did not have any subsidiary corporations. On January 25, 1989, SRSNJ became a subsidiary of Safety-Kleen Corp. Prior to January 25, 1989, SRSNJ was a subsidiary of SRS, Inc. Safety-Kleen has never had any relationship with SRS, Inc. The information regarding the parent corporations of SRSNJ is set forth below.

Safety-Kleen Corp.: 1000 North Randall Road

Elgin, IL 60123

President: Mr. John G. Johnson, Jr.

1000 North Randall Road

Elgin, IL 60123

Chairman: Mr. Donald W. Brinckman

1000 North Randall Road

Elgin, IL 60123

SRS, Inc.:

formerly located at 1200 Sylvan Street

Linden, NJ 07036

President:

At the time of Safety-Kleen's acquisition of

SRSNJ on January 25, 1989, Carleton Boll

was the president of SRS, Inc.

Chairman:

At the time of Safety-Kleen's acquisition of

SRSNJ on January 25, 1989, Carleton Boll

was the Chairman of SRS, Inc.

e. If the company is a successor to, or has been succeeded by, another company, identify such other company and provide the same information requested above for the predecessor or successor company.

On information and belief, there were no predecessor or successor corporations for SRSNJ.

f. If the Company transacted business with Bayonne Barrel & Drum in the name of an entity not disclosed above, give the name of such entity and state its relationship to the Company.

To the best of our knowledge, SRSNJ did not transact business with Bayonne Barrel & Drum in the name of any other entity.

2. Company's Relationship to Bayonne Barrel & Drum

a. State whether the Company or any Company facility transacted any business with Bayonne Barrel & Drum for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

A diligent search of all existing historic SRSNJ records located at the Linden, NJ facility was conducted. To date, we have been unable to locate any files, records or other documents which contain information regarding business transacted with Bayonne Barrel & Drum for the disposal, treatment, or storage of any drums. SRSNJ has in its possession the documents regarding Bayonne Barrel & Drum

which were produced by EPA in response to our Freedom of Information Request dated October 13, 1995. These documents were also reviewed in connection with this response. Because they were obtained from EPA, they are not being produced as part of this response.

Interviews with former employees of SRSNJ were also conducted. Ulisse F. Marini, former Plant Supervisor, Ronald Fisher, former Plant Superintendent, John Wendell, former Operations Manager, Michael Smith, former Sales Manager and Andrea Crimi, former Office Manager were consulted regarding any information they may have with regard to the Bayonne Barrel & Drum Site. All of the above-referenced individuals remember dealings between SRSNJ and Bayonne Barrel and Drum for the purchase by SRSNJ of reconditioned drums and for the reconditioning of 55-gallon drums sent to Bayonne Barrel & Drum by SRSNJ. None of the former employees who were consulted could remember any specific information regarding the business transactions, other than that they believe the timeframe in which SRSNJ dealt with Bayonne Barrel & Drum was from approximately 1964 until the early 1980's.

 i. If so, describe the relationship (nature of services rendered or products sold to the Company) between the Company and Bayonne Barrel & Drum;

Based on the documents produced by EPA in response to the Freedom of Information Request and discussions with former employees, SRSNJ utilized Bayonne Barrel and Drum for the purchase of reconditioned drums and for the reconditioning of empty drums from SRSNJ's Linden, NJ facility.

ii. Provide copies of any contracts or agreements between the Company and Bayonne Barrel & Drum;

To date, we have been unable to locate any contacts or agreements between SRSNJ and Bayonne Barrel & Drum.

iii. For each such facility, state the nature of the operations conducted at the facility, including the time period in which the facility operated; and

SRSNJ recovered spent organic solvents for reuse and disposed of used solvent streams when recovery was not feasible. It served a variety of customers including coatings manufacturers and users, pharmaceutical, chemical, and electronic manufacturers, and metal finishers at its facility in Linden, NJ. The facility provided flash distillation for recovery and return to the customer of wash and cleaning solvents. Additionally, SRSNJ had

fractional distillation capability involving the separation of two or more solvents for customer reuse or resale to another user. This service was typically provided to pharmaceutical and chemical companies. SRSNJ's Linden facility also provided fuel blending for use as a supplementary fuel in cement and aggregate kilns.

iv. For each such facility, state its name. address and current RCRA Identification Number.

Solvents Recovery Service of New Jersey, Inc. 1500 Sylvan Street
Linden, NJ 07032
EPA ID: NJD002182897

- b. In addition, if the Company transacted business with Bayonne Barrel & Drum, provide the following information for each transaction:
 - i. Identify the specific dates of each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;

Although information contained in the documents produced by EPA only cover the timeperiod of 1981 through 1982, discussions with former SRSNJ employees indicate that SRSNJ may have had regular dealings with Bayonne Barrel & Drum as early as 1964. However, we have been unable to locate any documents for this period and therefore cannot provide more specific information.

ii. Identify the number of containers that were the subject of each such transaction;

SRSNJ is not in the possession of any documentation regarding the number of drums sent for reconditioning, other than the materials produced by the EPA in response to our Freedom of Information Request.

iii. Generically describe each such container that was the subject of each such transaction (example: closed-head steel drums, etc.)

Based on discussions with former SRSNJ employees, the containers sent to Bayonne Barrel & Drum for reconditioning were 55-gallon "chop cut" drums in which the tops were removed.

iv. Identify the intended purpose of each such transaction;

Based on discussions with former employees and documents produced by EPA, the types of transactions between SRSNJ and Bayonne Barrel & Drum included the purchase of reconditioned drums by SRSNJ and the reconditioning of drums by Bayonne Barrel & Drum for SRSNJ.

v. State whether each container that was the subject of the transaction contained any substance at the time of the transaction. As to each container that contained any substance:

Based on discussions with former employees and documents produced by EPA, the drums sent to Bayonne Barrel & Drum to be reconditioned were empty.

- (1) Identify each such substance, including its chemical content, physical state, quantity by volume and weight, and other characteristics; and
- (2) Provide all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
- vii. If you contend that any such Container did not contain any substance at the time of the transaction:
 - (1) State whether such container had previously been used by the Company to contain any substance, and if so:
 - (a) Identify all substances previously contained within such container, including its chemical content, physical state, and other characteristics; and
 - (b) Provide as to such substances, all written analyses that may have been made for each such substance or which may be in the custody or control of the company and all material safety data sheets, if any, relating to each such substance;

Based on a diligent review of files located at the Linden, NJ facility, we have been unable to locate written analyses or other documentation regarding the chemical content, physical state or other characteristics of substances previously contained in the drums sent to Bayonne Barrel & Drum to be reconditioned.

vii. Describe in detail any treatment of any container that may have been performed by or on behalf of the company prior to the time that the Container was transferred from the company, including any process or procedure by which the Container was emptied or cleaned;

Based on interviews with former employees, liquid was pumped out of the 55-gallon drums and any solids were manually shoveled out of the drums before they were sent for reconditioning.

viii. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices;

To the best of our knowledge, SRSNJ does not have any documents relating to its transactions with Bayonne Barrel & Drum, other than those produced by EPA in response to our Freedom of Information Request.

ix. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction; and

All former employees consulted could not remember specific information regarding SRSNJ's transactions with Bayonne Barrel & Drum, other than that SRSNJ sent drums to be reconditioned and occasionally purchased reconditioned drums from Bayonne Barrel & Drum. It appears that some of the invoices produced by EPA have been signed by Ron Fisher on behalf of SRSNJ Mr. Fisher was consulted in the preparation of these responses, but could not remember any detailed information of the transactions between SRSNJ and Bayonne Barrel & Drum.

x. If you sent any container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Based on discussions with former employees, third party transporters were not utilized when drums were shipped to Bayonne Barrel & Drum to be reconditioned.

3. Identify any other person (e.g. individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title and a description of their responsibilities.

SRSNJ is not aware of any other persons who have knowledge of facts relating to EPA's Request s, other than the former SRSNJ employees identified in Response 4.

4. Identify each person consulted in responding to these questions and correlate each person to the question on which he or she was consulted.

The following persons were consulted in the preparation of SRSNJ's responses:

John Wendell Former SRSNJ Operations Manager 1200 Sylvan Street Linden, NJ 07036 (908) 862-2000 Response #2

Ronald Fisher
Former SRSNJ Plant Superintendent
519 Almon
Woodridge, NJ 07095
(908) 634-9149
Response #2

Ulisse F. Marini Former Plant Supervisor 1000 North Randall Road Elgin, IL 60123 (708) 468-2810 Response #2

Andrea Crimi
Former SRSNJ Office Manager
1200 Sylvan Street
Linden, NJ 07036
(908) 862-2000
Response #2

Michael Smith
Former SRSNJ Sales Manager
1000 North Randall Road
Elgin, IL 60123
(708) 468-5836
Response #2

5. Provide a list of all insurance policies and indemnification agreements held or entered into by you that may indemnify you against any liability that you may be found to have under CERCLA. Specify the insurer, type of policy, effective dates, and state per occurrence policy limits for each policy. Copies of policies may be provided in lieu of a narrative response. In response to this request, please provide not only those policies and agreements that are currently in effect, but also those in effect since your company began sending containers to the site.

A list of SRSNJ's insurance policies which includes the requested information is attached hereto as <u>Exhibit A</u>. SRSNJ objects to the remainder of this Request on the basis that information regarding indemnification agreements is irrelevant.

6. State whether there exists any agreement or contract (other than an insurance policy) which may indemnify the Company, present or past directors, officers or owners of shares in the Company, for any liability that may result under CERCLA. Provide a copy of any such agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.

SRSNJ objects to this Request on the basis that the information is irrelevant.

7. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported containers to the site.

SRSNJ is not in the possession of any additional information or documents regarding other sources who may have disposed of or transported containers to the site.

Exhibit A

Schedule 6.13

Material Agreements

(i) Comprehensive General Liability Occurrence Policies of Insurance on Which SRSNJ is Named Insured

Primary Coverage

Policy	Dates	<u>Limits</u>
1. Orion Insurance Co. Policy No. 60/74655607	8/20/60 to 8/20/61	BI \$50,000/ \$100,000
		PD \$5,000/ \$25,000
2. Mt. Vernon Fire Insurance Co. Policy No. CC72-61-	8/20/61 to 8/20/62	BI \$100,000/ \$300,000
2/SL72-61-2	•	PD \$5,000/ \$25,000
3. Mt. Vernon Policy No. MCL2-1177	8/20/63 to 8/20/64	BI \$100,000/ \$300,000
		PD \$5,000/ \$25,000
4. Mt. Vernon Policy No. MCL2-1183/ SL72-63-64	8/20/64 to 8/20/65	BI \$100,000/ \$300,000
ार् _क के ल र		PD \$5.000/ \$25.000
5. Lloyd's Policy No. LU56-72-64-46	8/20/64 to 8/20/65	BI \$100,000/ \$300,000
	•	PD \$5.000/ \$25,000
6. Tri-State Insurance Co., Policy No. MCL79-	8/20/65 to 8/20/66	BI \$100,000/ \$300,000
60-40		PD \$5,000/ \$25,000

Policy .	Dates	Limits	
7. Tri-State Insurance Co., Policy No, MCL70- 60-49	e 8/20/66 to - 8/20/67	BI \$100,000/ \$300,000	
		PD \$5,000/ \$25,000	
8. Tri-State Insurance Co., Policy No. MCL70- 60-57	8/20/67 to 8/20/68	BI \$100,000/ \$300,000	
		PD \$5,000/ \$25,000	
9. Tri-State Insurance Co., Policy No. MCL79- 60-65	8/20/68 to 8/20/69	BI \$100,000/ \$300,000	
		PD \$5,000/ \$25,000	
10. Allstate Insurance Co., Policy No. 9 996 A0270	expired 10/11/69	unknown	
11. Allstate Insurance Co., Policy No 9 995 A 270 12-18-1	12/18/70 to 12/18/71	BI \$500,000/ \$1,000,000	
12. Globe Indemnity Co. Policy No. LU 70-52-56	3/25/72 to 3/25/73	Bi \$500,000/ \$1,000,000	
13. Hartford Insurance		PD \$500,000/ \$500,000	
Co., Policy No. 18C839970	3/25/73 to 3/25/74	BI \$1,000,000/ \$1,000,000	
14 • • • • • • • • • • • • • • • • • • •		PD \$500,000/ \$500,000	
14. Hartford Insurance Co.	3/25/74 to 3/25/75	BI \$1,000,000/ \$1,000,000	
		PD \$500,000/ \$500,000	
ls. Hartford Insurance Co. Policy No L8C848109	3/25/75 to 3/25/76	BI \$1.000,00/ \$1.000,000	
		PD \$500,000/ \$500,000	
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Policy	<u>Dates</u>	Limits		
16. Hartford Insurance co. Policy No. 13C706518	3/25/76 to 3/25/77	BI \$1,000,000, \$1,000,000		
		PD \$500,000/ \$500,000		
17. Hartford Insurance Co. Policy No. 13C711056	3/25/77 to 3/25/78	BI \$1,000,000, \$1,000,000		
		PD-\$500,000/ \$500,000		
18. Hartford Insurance Co. Policy No. 13C714344	3/25/78 to . 8/11/78	BI \$1,000,000, \$1,000,000		
•		PD \$1,000,000, \$1,000,000		
19. Midland Insurance Co. Policy No. GL191 054	8/22/78 to 8/22/79	BI \$100,000/ \$100,000		
20. Midland Insurance	8/22/79 to	PD \$100,000/ \$100,000		
Co. Policy No. SL 198257	8/22/80	BI \$100,000/ \$100,000		
		PD \$100,000/ \$100,000		
1. National Union First Insurance Co. Folicy No. GLA905-39-54	8/22/80 to 6/30/81	BI \$1,000,000, \$1,000,000		
	•	PD \$1,000,000 \$1,000,000	. · · · · ·	
2. National Union ire Insurance Co. enewal	6/30/81 to 6/30/82	BI \$1.000,000/ \$1,000,000		
3. Home Indemnity Co.		PD \$1,000,000 \$1,000,000		
olicy No. GL 1350543	6/30/82 to 7/1/83	BI \$1,000,000/ \$1,000,000		
·		PD \$1,000,000/ \$1,000,000	·	
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Policy	Dates	Limits
24. Home Indemnity Co. Renewal	7/1/83 to 7/1/84	BI \$1,000,000. \$1,000,000
		PD \$1,000,000/ \$1,000,000
25. Home Indemnity Co. Policy No. GL 1475892	7/1/84 to 6/30/85	BI \$1,000,000/ \$1,000,000
		PD \$1,000,000/ \$1,000,000
26. National Union Fire Insurance Co. Policy No. 5-9961973	6/30/85 to 6/30/86	BI \$1,000,00/ \$2,000,000
	· .	PD \$1,000,000/ \$2,000,000
27. National Union Fire Insurance Co. Policy No.	6/30/86 to 2/18/87	BI \$1,000,000/ \$1,000,000
5-9961973		PD \$1,000,000/ \$1,000,000
28. National Union Fire Ins. Co. Policy No. S-9961973	2/18/87 to 6/30/87	BI \$1,000,000/ \$1,000,000
		PD \$1,000,000/ \$1,000,000
29. United Capital Policy No. GLCM2000363	6/30/87 to 6/30/88	BI \$1,000,000/ \$1,000,000
		PD \$1,000,000/ \$1,000,000
30. Lexington Ins. Co. Policy No. GL8641267	6/30/88 to 6/30/89	BI \$1,000,000/ \$1,000,000 PD \$1,000,000/ \$1,000,000 Includes Owners & Contractors Protective Liability and Products/ Completed Operations Liability

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EXCESS COVERAGE

Policy	Dates	Limits
1. Lloyds Policy No. CC-SL-72-65 -35 and Policy No.	3/9/65 to 3/9/66	PD \$45,000/ \$75,000
LUSL-72-65-29		BI and PD - total limit \$500,000
2. Lloyds Policy No. CC-S1-72-66 -6 and Policy No.	3/9/66 to 3/9/67	PD \$45,000/ \$75,000
SL-72-66-6	•	BI and PD total limit \$500,000
3. Lloyds Policy No. LU SL-72-67 -03 and Policy No.	3/9/67 to 3/9/68	PD \$45,000/ \$75,000
LUSL-72-67-05 and Policy No. CCSL-72-67 -05		BI and PD - total limit \$500,000
4. Lloyds Policy No. LU SL-72-68 -06 and Policy No. LUSL-72-68-07	3/9/68 to 3/9/69	BI and PD - total limit \$500,000
5. National Union Fire Insurance Co. Policy No. BE 1150460	3/20/75 to 3/20/76	PD \$2,000,000/ \$2,000,000
6. Central National Insurance Co. Policy No. CMU12-79-48	9/14/77 to 9/14/78	PD \$2,000,000/ \$2,000,000
7. Excess Insurance Co. (Policy No. EL10083	3/22/79 to 3/22/80	PD \$900.000/ \$900.000

Policy	Dates	Limits
8. Excess Insurance Co Policy No. EL10279	. 8/22/78 to 8/22/79	PD \$900,000/ \$900,000
9. North Star Reinsurance Co. Policy No. NSX-16554	9/14/78 to 8/22/79	PD \$1,000,000/ \$1,000,000
10. Northeastern Fire Policy No. 66-1426	8/22/79 to 8/22/80	PD \$1,000,000/ \$1,000,000
11. Integrity Insurance Co. Policy No. ISX102331	8/22/80 to 6/30/81	PD \$5.000,000/ \$5.000,000
i2. Midland Insurance Co. Policy No. XL152822	8/22/80 to 8/22/81	PD \$5,000,000/ \$5,000,000 (over Integrity)
13. American Centennial Insurance Co. Policy No. XC-00-07 -69	6/31/81 to 6/31/82	PD \$5,000,000/ \$5,000,000
14. Northeastern Fire Insurance Co. Policy No. 13120	6/30/81 to 6/30/82	PD \$5,000,000/ \$5,000,000 (over American Centennial)
15. Twin City Fire Insurance Co. Policy No. TXU-104593	6/30/82 to 6/30/83	PD \$10,000,000/ \$10,000,000
16. Twin City Fire Insurance Co. Policy No. TXU - 107529	6/30/83 to 6/30/84	PD \$10,000,000/ \$10,000,000

Policy Dates Limits

17. Pacific Employees 7/1/84 to PD \$2,000,000/
Insurance Co. 7/1/85 \$2,000,000
Policy No. XMO011004

(ii) Automobile Insurance Policies on Which SRSNJ is a Named Insured

Policy Dates Limits

Twin City of Hartford 6/30/87 to \$300,000/
Policy No. 79VZVV4478 6/30/88 \$5,000,000

National Union Ins. Co. 6/30/88 to \$1,000,000/
Policy No. AU8020402 6/30/89 \$5,000,000



November 22,, 1995

Mr. Joseph Cosentino, OSC Removal Action Branch Emergency and Remedial Response Division U.S. Environmental Protection Agency, Region II. 2890 Woodbridge Avenue Edison, NJ 08837

Re: Bayonne Barrel & Drum Superfund Site

Response to CERCLA 104(e) Information Request by The Solvents Recovery Service of New Jersey, Inc.

Dear Mr. Cosentino:

Attached please find the "Certification of Answers to Request for Information" for the responses submitted on behalf of The Solvents Recovery Service of New Jersey for the above-referenced matter on November 15, 1995. The Certification has been executed by Ulisse F. Marini, Vice President of Recycle Operations for Safety-Kleen.

In addition, please make the following two minor corrections to the responses previously submitted on behalf of SRSNJ: Under Question 4, John Wendell should be listed as the former plant supervisor and Ulisse Marinin should be listed as the Former Plant Manager.

If you have any questions or are in need of any additional information, please do not hesitate to contact me.

Sincerely,

Laura A. Novak

Environmental Paralegal

cc: Marc Seidenberg, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of	ILLINOIS	•
	PANE	
County of	KANE	

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

VICE PRESIDENT, RECYCLE OPERATIONS
TITLE (print or type)

SIGNATURE

Sworn to me before this

22nday of November, 1995

Notary Public

OFFICIAL SEAL
URSULA HURSH
NOTARY PUBLIC, STATE OF HUMO
My Commission Expires May 19, 191